

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Re: D.I. 2207, 2381, 2557, 2681, 2722,
2768, 2900**

**CERTIFICATION OF COUNSEL REGARDING ORDER GRANTING IN PART AND
DENYING IN PART HOMEVIEW DESIGN, INC.'S MOTION FOR ALLOWANCE
AND IMMEDIATE PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**

The undersigned counsel hereby certifies as follows:

1. On September 9, 2024 (the “**Petition Date**”), the above-captioned debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “**Court**”).
2. On March 11, 2025, HomeView Design Inc. (“**HomeView**”) filed *HomeView Design Inc. ’s Motion for Allowance and Immediate Payment of Administrative Expense Claims, Pursuant to 11 U.S.C. §§ 503(b)(1)(A) and 503(b)(9)* [D.I. 2207] (the “**Motion**”).²

¹ The debtors and debtors in possession in these Chapter 11 Cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion, the Debtors’ letter objection to the Motion [D.I. 2557], *HomeView Design Inc. ’s Supplemental Brief in Support of the Allowance and Immediate Payment of Its Post-Closing Administrative Expense Claim* [D.I. 2681] (the “**Reply**”), and the Debtors’ surreply to the Motion [D.I. 2722], as applicable.

3. On May 13, 2025 (the “**May 13 Hearing**”), the Court held an evidentiary hearing on HomeView’s claim relating to purchase order nos.: 95558537, 95558538, 95558539, 95643797, 95678063, 95696535, 95696536, 95696537, and 95610243 (the “**Claim**”).

4. At the conclusion of the May 13 Hearing, the Court took the matter under advisement.

5. On May 21, 2025, the Court issued an oral ruling [D.I. 2768] (the “**May 21 Ruling**”).

6. Following the May 21 Ruling, the Debtors and HomeView (together, the “**Parties**”) conferred through counsel (both via email and teleconference) regarding a form of order consistent with the Court’s Rulings.

7. However, the Parties disagree over the interpretation of the Court’s May 21 Ruling, specifically with respect to the calculation of the amount of HomeView’s Claim (the “**Claim Amount**”).

8. Accordingly, despite good faith efforts by the Parties to agree on the Claim Amount, the Debtors and HomeView have each proposed a form of order reflecting the Parties’ respective positions on the interpretation of the May 21 Ruling and the calculation of the Claim Amount. A form of order proposed by the Debtors is attached hereto as Exhibit A (the “**Debtors’ Proposed Order**”). A form of order proposed by HomeView was attached as Exhibit A to the *Certification of Counsel Regarding Order Granting in Part and Denying in Part HomeView Design, Inc.’s Motion for Allowance and Immediate Payment of Administrative Expense Claim* [D.I. 2900].

[*Remainder of page intentionally left blank*]

WHEREFORE, the Debtors respectfully request that the Court enter the form of the Proposed Order attached hereto as **Exhibit A** at the Court's earliest convenience.

Dated: June 23, 2025
Wilmington, Delaware

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